

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

| | | |
|----------------------|------------------|-----------------------|
| Daniel M. Finegan | <u>Debtor(s)</u> | CHAPTER 7 |
| DITECH FINANCIAL LLC | <u>Movant</u> | |
| vs. | | NO. 19-11819 ELF |
| Daniel M. Finegan | <u>Debtor(s)</u> | |
| | | 11 U.S.C. Section 362 |

STIPULATION

AND NOW, it is hereby stipulated and agreed by and between the undersigned as follows:

The Automatic Stay of all proceedings, as provided under Section 362 of the Bankruptcy Reform Act of 1978 (The Code) 11 U.S.C. Section 362, is modified and annulled to allow DITECH FINANCIAL LLC and its successor in title to proceed with all necessary post-Sheriff's Sale activity regarding the premises, 403 Dogwood Circle, Aston, PA 19014 ("the Premises"), including recording of the sheriff's deed. The stay provided by Bankruptcy Rule 4001(a)(3) has been waived.

IT IS FURTHER STIPULATED AND VOLUNTARILY AGREED THAT:


1. The recitals are incorporated herein and made a part hereof;
2. The Premises went to Sheriff's Sale in Delaware County on February 15, 2019 pursuant to the foreclosure judgment held by Movant.
3. The Sale occurred prior to the filing of the instant bankruptcy and is thus valid.
4. Further, under Pennsylvania state law, Debtor has no right of redemption in the mortgage foreclosure action.
5. Debtor agrees that Movant may now proceed with recording the Sheriff's Deed for the Premises.
6. Debtor agrees that Movant may now proceed with any other necessary post-Sale activity with regards to the Premises.
7. Debtor agrees that Movant may proceed with securing the Premises as necessary.
8. This Stipulation represents the totality of the agreement between the parties;

9. Any modifications, retractions or revisions must be in writing and signed by all parties;
10. The parties agree that a facsimile signature shall be considered an original signature.

Date: April 25, 2019

By: /s/ Rebecca A. Solarz, Esquire
Attorney for Movant

Date: 5/6/19


Patricia M. Mayer Esq.
Attorney for Debtor(s)

Approved by the Court this ____ day of _____, 2019. However, the court retains discretion regarding entry of any further order.

Bankruptcy Judge
Eric L. Frank